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December 1, 2003

RECEIVED

DEC - 1 2003

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Ms. Marlene H. Dortch, Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, D C. 20554

Re: Petition for Clarification or, in the Alternative, Waiver, filed November 26, 2003  
CC Docket No. 96-128

Dear Ms. Dortch

Submitted herewith is supplemental information designed to add Cimarron Telephone Company (the "Company") as a party/petitioner to above-captioned "Petition for Clarification or, in the Alternative Waiver" ("Petition") filed November 26, 2003. Attached hereto is the Company's declaration<sup>1</sup> and a revised Attachment A reflecting the Company as a party/petitioner in this matter.

Please direct any inquiries to the undersigned.

Sincerely,



Thomas J. Moorman

Attachments

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<sup>1</sup> The Declaration bears a facsimile signature. The original will be filed with the Federal Communications Commission upon receipt by counsel.

**Attachment**

**Page 1 of 2**

Adams Telephone Co-Operative, Illinois  
Alma Telephone Company, Georgia  
The Armstrong Telephone Companies (for the states as noted)  
Baldwin Telecom, Inc., Wisconsin  
Bay Springs Telephone Company, Mississippi  
Ben Lomand Rural Telephone Cooperative, Inc., Tennessee  
Berkshire Telephone Corporation, New York  
Brandenburg Telephone Company, Kentucky  
Brantley Telephone Company, Inc., Georgia  
Brazoria Telephone Company, Texas  
Campti-Pleasant Hill Telephone Company, Inc., Louisiana  
Canadian Valley Telephone Co., Oklahoma  
Cascade Utilities, Inc., Oregon  
Central Montana Communications, Inc., Montana.  
CenturyTel, Inc. (for the states as noted)  
Cherokee Telephone Company, Oklahoma  
Chibardun Telephone Cooperative, Inc., Wisconsin  
Cimarron Telephone Company, Oklahoma  
Citizens Mutual Telephone Company, Iowa  
Coastal Utilities, Inc., Georgia  
Copper Valley Telephone, Inc., Arizona  
Crockett Telephone Company, Tennessee  
Cross Telephone Company, Oklahoma  
Darien Telephone Company, Inc., Georgia  
Decatur Telephone Company, Mississippi  
Delta Telephone Company, Mississippi  
Ducor Telephone Company, California  
Duo County Telephone Cooperative, Kentucky  
East Ascension Telephone Co. LLC, Louisiana  
Foothills Rural Telephone Cooperative Corp., Inc., Kentucky  
Franklin Telephone Company, Mississippi  
Garden Valley Telephone Company, Minnesota  
Glenwood Telephone Company, Georgia  
Grand River Telephone Corporation, Missouri  
Green Hills Telephone Corporation, Missouri  
Gulf Telephone Company, Alabama  
Hancock Telephone Company, New York  
Hancock Rural Telephone Corp d/b/a Hancock Telecom, Indiana  
Hinton Telephone Co, Inc., Oklahoma  
Loretel Systems, Inc., Minnesota

**Revised 12/01/03**

**Attachment A**

**Page 2 of 2**

Margaretville Telephone Company, Inc., New York  
The Middleburgh Telephone Company, New York  
Millington Telephone Co., Inc., Tennessee  
Missouri Valley Communications, Inc., Montana  
Moundville Telephone Company, Inc., Alabama  
National Telephone of Alabama, Alabama  
Nemont Telephone Cooperative, Inc., Montana  
New Ulm Telecom, Inc, Minnesota  
Newport Telephone Company, Inc., New York  
North Central Telephone Cooperative, Inc., Tennessee  
Peoples Telephone Company, Tennessee  
Pioneer Telephone Cooperative, Inc., Oklahoma  
Poka Lambro Telephone Cooperative, Inc., Texas  
Price County Telephone Company, Wisconsin  
Project Telephone Company, Montana  
Ringgold Telephone Co., Georgia  
Roanoke Telephone Company, Tennessee  
Ruthven Telephone Exchange Co., Iowa  
SEI Communications, Indiana  
Shidler Telephone Company, Oklahoma  
Smart City Telecommunications LLC/d/b/a Smart City Telecom, Florida  
South Central Rural Telephone Cooperative Corp., Inc., Kentucky  
Stayton Telephone Cooperative Telephone Co., Oregon  
Rio Virgin Telephone Company, Nevada  
Tohono O'odham Utility Authority, Arizona  
Trans Cascades Telephone Company, Oregon  
Trenton Telephone Company, Georgia  
Triangle Telephone Cooperative Assn., Inc., Montana  
Valley Telecommunications, Inc., Montana  
Valley Telephone Cooperative, Inc., Arizona  
West Kentucky Rural Telephone Cooperative Corp., Kentucky  
West Tennessee Telephone Company, Tennessee

**Revised 12/1/03**

## DECLARATION OF PETITIONING INCUMBENT RURAL TELEPHONE COMPANY

The undersigned company is a rural telephone company that received a memorandum dated August 29, 2003 together with an attached invoice from APCC Services, Inc. on behalf of various Payphone Service Providers ("PSPs") that referenced the Federal Communications Commission decision from October, 2002 addressing compensation obligations to PSPs.

When dial around calls and subscriber toll-free calls are made from payphones located in the Company's service area, we automatically route those calls from our central office to the toll provider (the Regional Bell Operating Company or other Interexchange Carrier) assigned the access code or the 8XX number being dialed. This automatic routing is triggered by the end user dialing a "1" and occurs even where the call is ultimately terminated to an end user located within our service area. Once routed to the toll provider, however, the toll provider controls the routing of the call and how that call will be terminated. Unlike the regional Bell Operating Company, our company is not an intraLATA toll provider.

Accordingly, when calls are made from any pay station in our service area, it is not possible for our company to handle a call that is compensable. Unlike the regional Bell Operating Companies or other local exchange carriers that provide intraLATA services on a compensable basis, our company provides only originating access service to other carriers. With respect to the traffic associated with the invoice received from APCC, we conclude that the compensable calls were handled by the intraLATA toll provider that is assigned to the paystation; no compensable calls were handled by our company.

I do hereby declare under penalties of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief, and that I am authorized by the Company indicated below to provide this Declaration.

Date: 11-25-03

Gene Baldwin  
(signature)

Gene Baldwin  
(printed name)

GM  
(Title)

Company Name: Cimarron Telephone Company


Company Address: PO Box 140

101 Cimarron Street

MANNFORD, OK 74644

**CERTIFICATE OF SERVICE**

I, Thomas J. Moorman, of Kraskin, Lesse & Cosson, LLC, 2120 L Street, NW, Suite 520, Washington, DC 20037, do hereby certify that a copy of the foregoing supplement to the "Petition for Clarification or, in the Alternative, Waiver" was served on this 1st day of December 2003, to the following parties.

  
\_\_\_\_\_  
Thomas J. Moorman

William Maher, Chief  
Wireline Competition Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554  
(Hand Delivered)

Qualex International  
445 12<sup>th</sup> Street, SW  
Room CY-B402  
Washington, DC 20554  
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